

**To:** 'Middleton, Alan'[AlanMiddleton@DWT.COM]  
**Cc:** Leighann Denton[Leighann.Denton@ci.bremerton.wa.us]; Thelma Swem[Thelma.Swem@ci.bremerton.wa.us]  
**From:** Mark Koontz  
**Sent:** Fri 4/10/2009 5:10:57 AM  
**Subject:** RE: Sesko  
2009.04.10 Stip and Order to Propound Interrogatories.doc

(b)(6) Please inquire of Ms. Sesko's availability on May 6, 7 and 11-15. Also, please ask her to be prepared to provide information regarding her personal property, real property, bank accounts, and other assets at the post-judgment deposition.

I have also attached a stip and order to allow the city to serve interrogatories on Ms. Sesko. If you agree to the stip, and if she can provide me with answers to the rogs in a reasonable time, I may not need to take her deposition in the 1997 matter. Let me know if you will sign the stip. Thanks.

-Mark

Mark E. Koontz  
Assistant City Attorney  
City of Bremerton  
345 Sixth Street, Ste. 600  
Bremerton, WA 98337  
360-473-2345  
[mark.koontz@ci.bremerton.wa.us](mailto:mark.koontz@ci.bremerton.wa.us)

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**From:** Middleton, Alan [mailto:AlanMiddleton@DWT.COM]  
**Sent:** Friday, April 10, 2009 11:29 AM  
**To:** Mark Koontz  
**Subject:** RE: Sesko

No -- mediation on the 17th, and I have an opening appeal brief that has to be mailed to the Idaho Supreme Court on the 23rd so I have to reserve the 22nd. After the brief is out of my hands, things open up. Again, I don't know what Ms. Sesko's availability is -- whether she's even in the country. I'd suggest we map out dates from the 27th onward for two-three weeks.

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**From:** Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]  
**Sent:** Friday, April 10, 2009 11:25 AM  
**To:** Middleton, Alan  
**Subject:** RE: Sesko

Are you available April 17 or 22?

Mark E. Koontz  
Assistant City Attorney  
City of Bremerton  
345 Sixth Street, Ste. 600  
Bremerton, WA 98337

360-473-2345  
[mark.koontz@ci.bremerton.wa.us](mailto:mark.koontz@ci.bremerton.wa.us)

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**From:** Middleton, Alan [<mailto:AlanMiddleton@DWT.COM>]  
**Sent:** Friday, April 10, 2009 10:58 AM  
**To:** Mark Koontz  
**Cc:** Leighann Denton; Thelma Swem  
**Subject:** RE: Sesko

Mark, I'll check with Ms. Sesko re her availability and the photos/video. Personally, I have an immovable conflict on April 21, but could do Monday through Thursday the week following (27th through 30th).

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**From:** Mark Koontz [<mailto:Mark.Koontz@ci.bremerton.wa.us>]  
**Sent:** Friday, April 10, 2009 10:13 AM  
**To:** Middleton, Alan  
**Cc:** Leighann Denton; Thelma Swem  
**Subject:** Sesko

Alan,

Attached please find two Notices of Deposition of Ms. Sesko for April 21, 2009. The first notice is for the 07-2-01698-0 case; that deposition will begin at 9:30 a.m. The second notice is for a post-judgment deposition pursuant to CR 69(b) in the 97-2-01749-3 case; that deposition will begin at 3:00 p.m. Of course, if the first deposition ends prior to 3:00 p.m., we can begin the second deposition before 3:00 at the convenience of the parties. I will deliver to you the original notices by mail.

Also, I still have not received the photos and videos that Ms. Sesko and her family took at the inspection which are responsive to the City's requests for production. Would you please provide me with copies of the photos and videos by April 15, so I may use them to prepare for the deposition? Thank you.

-Mark

Mark E. Koontz  
Assistant City Attorney  
City of Bremerton  
345 Sixth Street, Ste. 600  
Bremerton, WA 98337  
360-473-2345  
[mark.koontz@ci.bremerton.wa.us](mailto:mark.koontz@ci.bremerton.wa.us)

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